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September 3, 2021

By ECF

Hon. P. Kevin Castel
United States Courthouse
500 Pearl St.
New York, NY 10007

**Re: *FSC Advisors, LLC v. Theia Group, Inc., et al.*, 21 Civ. 6995 (S.D.N.Y.) —
Request to Provisionally Redact and Seal Certain Limited Information**

Dear Judge Castel:

We represent the plaintiff FCS Advisors, LLC (“FCS”) in the above case, and write to respectfully request permission to redact or seal, at least provisionally, certain limited information associated with a letter and declaration that we will filing imminently and that will supplement FCS’s pending motion, brought by order to show cause, for a temporary receiver. Specifically, we would be sealing all or portions of Exhibits 2-5, 10-11, and 14-15 to the declaration, along with descriptions of those documents in the letter.

The information at issue was marked “Confidential” under the governing protective order by the defendants (collectively “Theia”), and consists largely of internal financial data. Given the press of time, we have not had a chance to confer with Theia about whether it would agree to lift its confidentiality designations. We expect Theia would not agree, because the information consists of financial data that parties often seek to keep private. With the Court’s permission, provisionally sealing this data will allow Theia an opportunity, if it wishes, to substantiate the position that the material should be shielded from the public dockets, without delaying matters on the motion that we brought on an expedited basis and that we believe is a matter of urgency.

Accordingly, we respectfully request the Court’s permission to provisionally redact or seal the items referenced above, along with references to those material in the accompanying letter.

* * *

We thank the Court for its consideration of this request.

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Respectfully,

/s/ Charles Michael

Charles Michael

cc: All Counsel of Record (via ECF)